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July 26, 2005

Mr. Paul Dabbs, Chief
Water Resources Evaluation Section
Statewide Water Planning Branch
California Department of Water Resources
P.O. Box 942836
Sacramento, California 94236-0001

Re: Draft Review of California Water Plan Update 2005

Dear Mr. Dabbs:

Thank you for the opportunity to comment on the draft Plan. Our comments are as follows:

Specific Comments:

1. In Volume 3, Chapter 8, it appears that the terms "Central Valley" and "San Joaquin Valley" are used synonymously. The Central Valley lies between the Coast Ranges and the Sierra Nevada, and stretches more than 400 miles from Redding in the north to the Tehachapi Mountains south of Bakersfield. The southern part of the Central Valley is known as the San Joaquin Valley. It includes the eight counties of San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare and Kern.
2. In Volume 3, Chapter 8, page 8-4, fourth paragraph, it should be noted that the cities of Fresno and Clovis are beginning to treat surface water for urban use.

General Comments:

1. The elimination of the "gap analysis" takes away a tool that has been traditionally used to identify and quantify the differences between supply and demand in a manner that is easily understood by the general population. We recommend that it be reinstated.
2. Over the long term, an average of just under 200,000 acre-feet of flood water is lost each year from the Kings River Service area. This situation is not unique to the Kings River. The Water Plan does not address how flood waters can be effectively managed to meet regional and state needs. We recommend that the Plan identify those areas where this condition exists, assess the losses, and provide for solutions.

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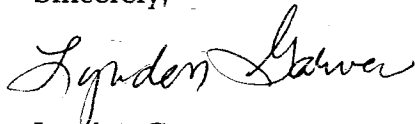
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3. The Plan identifies a number of strategies for dealing with water management. Placing storage near the bottom of the list may convey the message that development of new supplies and new storage are a low priority. Although this may not be the case, care should be taken that it is clearly not the case.
4. We support the concept of development of regional water planning and management by the local agencies and communities. However, state planning and support will still be needed for maintaining and improving the statewide infrastructure.

If we can provide any further assistance, please contact our office

Sincerely,



Lynden Garver
Assistant to the General Manager

LG/dr